

EXHIBIT E

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

IN RE NEW ENGLAND COMPOUNDING)
PHARMACY, INC. PRODUCTS LIABILITY)
LITIGATION)
_____)

MDL No. 2419
Dkt. No 1:13-md-2419 (RWZ)

THIS DOCUMENT RELATES TO:)

Suits Naming Specialty Surgery Center, PLLC)
_____)

**SSC DEFENDANTS' PRIVILEGE LOG FOR DOCUMENTS PRODUCED BY
CUMBERLAND MEDICAL CENTER**

Defendants Specialty Surgery Center, Crossville, PLLC ("SSC"), Kenneth R. Lister, MD ("Dr. Lister"), and Kenneth Lister, MD, PC ("Dr. Lister's Practice") (collectively, "SSC Defendants") submit the following privilege log for the documents produced by Cumberland Medical Center and reviewed for privilege by the SSC Defendants' pursuant to Magistrate Boal's order at Doc. 3015.

The privilege log is divided into two separate tables:

Table 1 identifies (1) the files that contain redactions by Bates-number, (2) the privilege(s) applicable to each redacted file, and (3) a description of the redacted information.

Table 2 identifies (1) the categories of documents withheld entirely, (2) the privilege(s) applicable to each category, (3) a description of the information withheld, (4) the senders/recipients of each category of documents, and (5) the estimated number of files withheld for each category.

TABLE 1

Description of Information Redacted	Privilege Asserted	Bates-Numbered Page(s)
<p>Information pertaining to activities undertaken as part of SSC's Continuous Quality Improvement program specifically related to physician conduct, competency, and ability to practice medicine, including the results of physicians' review of medical records for randomly-selected patients of other SSC physicians; incidents that occurred during procedures, investigations, and corrective action (e.g., hypoxic events, allergic reactions, etc.); reports of post-operative infections, investigation, and corrective action; reports of post-operative admissions, investigation, and corrective action; sentinel event reports; root cause analyses; reports of surgical delays caused by physicians and corrective action; grant and revocation of privileges at SSC; credentialing; coding/billing audits and corrective actions recommended by Calisher & Associates; a benchmark study on physician Propofol usage and corrective action; an issue involving a ASA Level IV patient and corrective</p>	<p>Quality Improvement Privilege, Tenn. Code Ann. § 68-11-272; Peer Review Privilege Tenn. Code Ann. § 63-6-219</p>	<p>CMC Subpoena Response E-Discovery 0009580 CMC Subpoena Response E-Discovery 0009582 CMC Subpoena Response E-Discovery 0009594 CMC Subpoena Response E-Discovery 0009636 CMC Subpoena Response E-Discovery 0009641 CMC Subpoena Response E-Discovery 0009969 CMC Subpoena Response E-Discovery 0009985 CMC Subpoena Response E-Discovery 0009988 CMC Subpoena Response E-Discovery 0010024 CMC Subpoena Response E-Discovery 0010029 CMC Subpoena Response E-Discovery 0010037 CMC Subpoena Response E-Discovery 0010041 CMC Subpoena Response E-Discovery 0010045 CMC Subpoena Response E-Discovery 0010082 CMC Subpoena Response E-Discovery 0010084 CMC Subpoena Response E-Discovery 0010088 CMC Subpoena Response E-Discovery 0010089 CMC Subpoena Response E-Discovery 0010090 CMC Subpoena Response E-Discovery 0010091 CMC Subpoena Response E-Discovery 0010092 CMC Subpoena Response E-Discovery 0010095 CMC Subpoena Response E-Discovery 0010097 CMC Subpoena Response E-Discovery 0010099 CMC Subpoena Response E-Discovery 0010101 CMC Subpoena Response E-Discovery 0010102 CMC Subpoena Response E-Discovery 0010105</p>

<p>action; and an issue involving diversion of controlled substances by a physician who left SSC several years before the outbreak and his subsequent enrollment in a Tennessee Medical Foundation program for substance abuse.</p>		<p>CMC Subpoena Response E-Discovery 0010107 CMC Subpoena Response E-Discovery 0010110 CMC Subpoena Response E-Discovery 0010112 CMC Subpoena Response E-Discovery 0010114 CMC Subpoena Response E-Discovery 0010116 CMC Subpoena Response E-Discovery 0010118 CMC Subpoena Response E-Discovery 0034440 CMC Subpoena Response E-Discovery 0049832 CMC Subpoena Response E-Discovery 0049850 CMC Subpoena Response E-Discovery 0049864 CMC Subpoena Response E-Discovery 0133014 CMC Subpoena Response E-Discovery 0143878 CMC Subpoena Response E-Discovery 0144251</p>
---	--	--

<p>Emails between Jean Atkinson and counsel¹ containing advice or information from counsel, seeking advice or information from counsel, or providing information to counsel for the purposes of obtaining advice from counsel, or emails containing information prepared in anticipation of litigation.</p>	<p>Attorney-Client Privilege; Work Product Doctrine; Common-Interest/Joint Defense Privilege</p>	<p>CMC Subpoena Response E-Discovery 0139351 CMC Subpoena Response E-Discovery 0139354 CMC Subpoena Response E-Discovery 0139413 CMC Subpoena Response E-Discovery 0139497 CMC Subpoena Response E-Discovery 0139565 CMC Subpoena Response E-Discovery 0140204 CMC Subpoena Response E-Discovery 0140211 CMC Subpoena Response E-Discovery 0140248 CMC Subpoena Response E-Discovery 0140254 CMC Subpoena Response E-Discovery 0140393 CMC Subpoena Response E-Discovery 0140404 CMC Subpoena Response E-Discovery 0140406 CMC Subpoena Response E-Discovery 0140434 CMC Subpoena Response E-Discovery 0140655 CMC Subpoena Response E-Discovery 0140720 CMC Subpoena Response E-Discovery 0141183 CMC Subpoena Response E-Discovery 0141516 CMC Subpoena Response E-Discovery 0142588 CMC Subpoena Response E-Discovery 0145253 CMC Subpoena Response E-Discovery 0145254 CMC Subpoena Response E-Discovery 0145296 CMC Subpoena Response E-Discovery 0145298 CMC Subpoena Response E-Discovery 0145436 CMC Subpoena Response E-Discovery 0145518 CMC Subpoena Response E-Discovery 0145647 CMC Subpoena Response E-Discovery 0145650 CMC Subpoena Response E-Discovery 0146203 CMC Subpoena Response E-Discovery 0146267 CMC Subpoena Response E-Discovery 0147040</p>
--	--	--

¹ Gideon, Cooper & Essary, PLLC and/or Peter Strianse.

Email from Kim Bowlin to Calisher & Associates ² conveying substance of discussion between Jean Atkinson and counsel.	Attorney-Client Privilege; Work Product Doctrine; Common-Interest/Joint Defense Privilege	CMC Subpoena Response E-Discovery 0140406 CMC Subpoena Response E-Discovery 0145518 CMC Subpoena Response E-Discovery 0145650
Email exchange between Kim Bowlin and counsel conveying information on behalf of Jean Atkinson due to a failure of Jean Atkinson's computer.	Attorney-Client Privilege; Work Product Doctrine; Common-Interest/Joint Defense Privilege	CMC Subpoena Response E-Discovery 0140655 CMC Subpoena Response E-Discovery 0145296 CMC Subpoena Response E-Discovery 0145298
Emails between STOPNC/Howell Allen, ³ or Donald Jones, MD ⁴ and counsel containing advice or information from counsel, seeking advice or information from counsel, or providing information to counsel for the purposes of obtaining advice from counsel, or emails containing information prepared in anticipation of litigation.	Attorney-Client Privilege; Work Product Doctrine; Common-Interest/Joint Defense Privilege	CMC Subpoena Response E-Discovery 0140146 CMC Subpoena Response E-Discovery 0140162 CMC Subpoena Response E-Discovery 0140164 CMC Subpoena Response E-Discovery 0140171 CMC Subpoena Response E-Discovery 0145188 CMC Subpoena Response E-Discovery 0145199 CMC Subpoena Response E-Discovery 0145201 CMC Subpoena Response E-Discovery 0145518 CMC Subpoena Response E-Discovery 0146168 CMC Subpoena Response E-Discovery 0146182

² Ron Calisher, Gina Calisher, Kevin Calisher, and/or Brandon Kowarsky.

³ John Culclasure, MD, Debra Schamberg, Greg Lanford, MD, Scott Butler, Dawn Rudolph, Dale Batchelor, MD, Craig Polkow, and/or Berry Holt.

⁴ References to Dr. Jones also include Joy Day, who worked in Dr. Jones' office.

Information pertaining to activities undertaken as part of SSC's Continuous Quality Improvement program, including nursing chart audits and corrective action; patient satisfaction survey results; investigations of equipment malfunctions affecting patient care and corrective actions; coding/billing audits and corrective actions recommended by Calisher & Associates; procedure cancellations and delays and corrective actions; results of pharmaceutical audit from pharmacist Tommy Arms; medication errors and corrective actions; patient incidents not involving physician conduct and corrective action (e.g., patient falls); periodic review of facility by Jean Atkinson or Calisher & Associates and corrective action (e.g. ensuring shelving in storage room is appropriate height above floor as required by applicable regulations, overall workflow and efficiency of facility, etc.); results of licensing and accreditation surveys and corrective action; HIPAA incidents, investigations, and corrective action; incorrect narcotic counts, investigation, and corrective action; Propofol usage study and corrective action; study on appropriate hair removal prior to surgery and	Quality Improvement Privilege, Tenn. Code Ann. § 68-11-272	CMC Subpoena Response E-Discovery 0009591 CMC Subpoena Response E-Discovery 0009593 CMC Subpoena Response E-Discovery 0009599 CMC Subpoena Response E-Discovery 0009605 CMC Subpoena Response E-Discovery 0009608 CMC Subpoena Response E-Discovery 0009610 CMC Subpoena Response E-Discovery 0009612 CMC Subpoena Response E-Discovery 0009613 CMC Subpoena Response E-Discovery 0009618 CMC Subpoena Response E-Discovery 0009622 CMC Subpoena Response E-Discovery 0009628 CMC Subpoena Response E-Discovery 0009632 CMC Subpoena Response E-Discovery 0009645 CMC Subpoena Response E-Discovery 0009647 CMC Subpoena Response E-Discovery 0009650 CMC Subpoena Response E-Discovery 0009653 CMC Subpoena Response E-Discovery 0009657 CMC Subpoena Response E-Discovery 0009670 CMC Subpoena Response E-Discovery 0009906 CMC Subpoena Response E-Discovery 0009964 CMC Subpoena Response E-Discovery 0009975 CMC Subpoena Response E-Discovery 0009979 CMC Subpoena Response E-Discovery 0009983 CMC Subpoena Response E-Discovery 0009992 CMC Subpoena Response E-Discovery 0009995 CMC Subpoena Response E-Discovery 0009999 CMC Subpoena Response E-Discovery 0010004 CMC Subpoena Response E-Discovery 0010005 CMC Subpoena Response E-Discovery 0010012 CMC Subpoena Response E-Discovery 0010016 CMC Subpoena Response E-Discovery 0010017 CMC Subpoena Response E-Discovery 0010018
---	--	--

corrective action; study on pain management patients completed without payment to SSC and corrective action; a report from a program to improve safe injection practices at SSC; a report from a study of sterile trays after wrappers were found to have holes in them and corrective action; study on proper administration of antibiotics prior to general surgery and corrective action; report from a study monitoring radiation dosimetry; results of study on patient signatures on forms regarding HIPAA and corrective action; results of pre-op procedure wait time and discharge time and corrective actions; results and corrective action from an internal audit on HIPAA compliance; sentinel event reports; root cause analyses; an issue with the care provided by a CRNA during non-pain management cases; an issue with patients sexually harassing staff members and corrective action; results of study on patient follow-up calls and corrective action; results of a study on supply costs for endoscopy and pain management and corrective action; an issue with excessive condensation in the operating room and corrective action; discussion about reducing clinical staff.		CMC Subpoena Response E-Discovery 0010020 CMC Subpoena Response E-Discovery 0010032 CMC Subpoena Response E-Discovery 0010053 CMC Subpoena Response E-Discovery 0010055 CMC Subpoena Response E-Discovery 0010062 CMC Subpoena Response E-Discovery 0010075 CMC Subpoena Response E-Discovery 0023699 CMC Subpoena Response E-Discovery 0023734 CMC Subpoena Response E-Discovery 0027030 CMC Subpoena Response E-Discovery 0027168 CMC Subpoena Response E-Discovery 0027441 CMC Subpoena Response E-Discovery 0028466 CMC Subpoena Response E-Discovery 0034697 CMC Subpoena Response E-Discovery 0034935 CMC Subpoena Response E-Discovery 0049891 CMC Subpoena Response E-Discovery 0049901 CMC Subpoena Response E-Discovery 0059954 CMC Subpoena Response E-Discovery 0059969 CMC Subpoena Response E-Discovery 0059971 CMC Subpoena Response E-Discovery 0092646 CMC Subpoena Response E-Discovery 0133014 CMC Subpoena Response E-Discovery 0133235 CMC Subpoena Response E-Discovery 0133304 CMC Subpoena Response E-Discovery 0139601 CMC Subpoena Response E-Discovery 0139602 CMC Subpoena Response E-Discovery 0139614 CMC Subpoena Response E-Discovery 0139615 CMC Subpoena Response E-Discovery 0144204 CMC Subpoena Response E-Discovery 0144217 CMC Subpoena Response E-Discovery 0144230 CMC Subpoena Response E-Discovery 0144233 CMC Subpoena Response E-Discovery 0144234 CMC Subpoena Response E-Discovery 0150191
---	--	---

		CMC Subpoena Response E-Discovery 0150492 CMC Subpoena Response E-Discovery 0158870 CMC Subpoena Response E-Discovery 0160119 CMC Subpoena Response E-Discovery 0163334 CMC Subpoena Response E-Discovery 0163969 CMC Subpoena Response E-Discovery 0166785 CMC Subpoena Response E-Discovery 0181022 CMC Subpoena Response E-Discovery 0181229 CMC Subpoena Response E-Discovery 0182533 CMC Subpoena Response E-Discovery 0183359 CMC Subpoena Response E-Discovery 0183580 CMC Subpoena Response E-Discovery 0186122 CMC Subpoena Response E-Discovery 0186738 CMC Subpoena Response E-Discovery 0194252 CMC Subpoena Response E-Discovery 0194345 CMC Subpoena Response E-Discovery 0211489 CMC Subpoena Response E-Discovery 0218090 CMC Subpoena Response E-Discovery 0218304 CMC Subpoena Response E-Discovery 0219790 CMC Subpoena Response E-Discovery 0221911
--	--	--

<p>Supervisor comments on employee evaluations which address improvements/deficiencies in activities involving patient care.</p>	<p>Quality Improvement Privilege, Tenn. Code Ann. § 68-11-272</p>	<p>CMC Subpoena Response E-Discovery 0058120 CMC Subpoena Response E-Discovery 0139520 CMC Subpoena Response E-Discovery 0139533 CMC Subpoena Response E-Discovery 0141083 CMC Subpoena Response E-Discovery 0141200 CMC Subpoena Response E-Discovery 0141592 CMC Subpoena Response E-Discovery 0141598 CMC Subpoena Response E-Discovery 0141721 CMC Subpoena Response E-Discovery 0143875 CMC Subpoena Response E-Discovery 0143892 CMC Subpoena Response E-Discovery 0147421 CMC Subpoena Response E-Discovery 0147539 CMC Subpoena Response E-Discovery 0156762 CMC Subpoena Response E-Discovery 0180810 CMC Subpoena Response E-Discovery 0183361 CMC Subpoena Response E-Discovery 0183366 CMC Subpoena Response E-Discovery 0188007 CMC Subpoena Response E-Discovery 0188013 CMC Subpoena Response E-Discovery 0189088 CMC Subpoena Response E-Discovery 0189094 CMC Subpoena Response E-Discovery 0193655 CMC Subpoena Response E-Discovery 0193660 CMC Subpoena Response E-Discovery 0193667 CMC Subpoena Response E-Discovery 0193668 CMC Subpoena Response E-Discovery 0193674 CMC Subpoena Response E-Discovery 0193686 CMC Subpoena Response E-Discovery 0194346 CMC Subpoena Response E-Discovery 0195568 CMC Subpoena Response E-Discovery 0195824 CMC Subpoena Response E-Discovery 0223629 CMC Subpoena Response E-Discovery 0223630 CMC Subpoena Response E-Discovery 0223636</p>
--	---	---

Non-Plaintiff patient information	HIPAA	CMC Subpoena Response E-Discovery 0009594 CMC Subpoena Response E-Discovery 0016342 CMC Subpoena Response E-Discovery 0016373 CMC Subpoena Response E-Discovery 0016395 CMC Subpoena Response E-Discovery 0016412 CMC Subpoena Response E-Discovery 0016434 CMC Subpoena Response E-Discovery 0016445 CMC Subpoena Response E-Discovery 0016468 CMC Subpoena Response E-Discovery 0016480 CMC Subpoena Response E-Discovery 0016497 CMC Subpoena Response E-Discovery 0016500 CMC Subpoena Response E-Discovery 0016526 CMC Subpoena Response E-Discovery 0016535 CMC Subpoena Response E-Discovery 0016544 CMC Subpoena Response E-Discovery 0016557 CMC Subpoena Response E-Discovery 0016585 CMC Subpoena Response E-Discovery 0016591 CMC Subpoena Response E-Discovery 0016604 CMC Subpoena Response E-Discovery 0016612 CMC Subpoena Response E-Discovery 0016634 CMC Subpoena Response E-Discovery 0016681 CMC Subpoena Response E-Discovery 0016687 CMC Subpoena Response E-Discovery 0016791 CMC Subpoena Response E-Discovery 0016810 CMC Subpoena Response E-Discovery 0016837 CMC Subpoena Response E-Discovery 0016856 CMC Subpoena Response E-Discovery 0016868 CMC Subpoena Response E-Discovery 0016884 CMC Subpoena Response E-Discovery 0016891 CMC Subpoena Response E-Discovery 0016895 CMC Subpoena Response E-Discovery 0016904 CMC Subpoena Response E-Discovery 0016920
-----------------------------------	-------	--

CMC Subpoena Response E-Discovery 0016924		
CMC Subpoena Response E-Discovery 0016939		
CMC Subpoena Response E-Discovery 0016945		
CMC Subpoena Response E-Discovery 0016949		
CMC Subpoena Response E-Discovery 0016963		
CMC Subpoena Response E-Discovery 0016994		
CMC Subpoena Response E-Discovery 0017010		
CMC Subpoena Response E-Discovery 0017017		
CMC Subpoena Response E-Discovery 0017028		
CMC Subpoena Response E-Discovery 0017038		
CMC Subpoena Response E-Discovery 0017081		
CMC Subpoena Response E-Discovery 0017089		
CMC Subpoena Response E-Discovery 0017112		
CMC Subpoena Response E-Discovery 0017181		
CMC Subpoena Response E-Discovery 0017477		
CMC Subpoena Response E-Discovery 0017541		
CMC Subpoena Response E-Discovery 0021669		
CMC Subpoena Response E-Discovery 0021945		
CMC Subpoena Response E-Discovery 0022854		
CMC Subpoena Response E-Discovery 0022906		
CMC Subpoena Response E-Discovery 0023402		
CMC Subpoena Response E-Discovery 0023406		
CMC Subpoena Response E-Discovery 0028393		
CMC Subpoena Response E-Discovery 0032942		
CMC Subpoena Response E-Discovery 0032955		
CMC Subpoena Response E-Discovery 0033251		
CMC Subpoena Response E-Discovery 0034174		
CMC Subpoena Response E-Discovery 0034177		
CMC Subpoena Response E-Discovery 0034205		
CMC Subpoena Response E-Discovery 0034209		
CMC Subpoena Response E-Discovery 0034215		
CMC Subpoena Response E-Discovery 0034218		
CMC Subpoena Response E-Discovery 0034221		

CMC Subpoena Response E-Discovery 0034228		
CMC Subpoena Response E-Discovery 0034232		
CMC Subpoena Response E-Discovery 0034244		
CMC Subpoena Response E-Discovery 0035524		
CMC Subpoena Response E-Discovery 0035728		
CMC Subpoena Response E-Discovery 0080832		
CMC Subpoena Response E-Discovery 0133235		
CMC Subpoena Response E-Discovery 0139402		
CMC Subpoena Response E-Discovery 0139426		
CMC Subpoena Response E-Discovery 0139432		
CMC Subpoena Response E-Discovery 0139469		
CMC Subpoena Response E-Discovery 0139472		
CMC Subpoena Response E-Discovery 0139473		
CMC Subpoena Response E-Discovery 0139474		
CMC Subpoena Response E-Discovery 0139515		
CMC Subpoena Response E-Discovery 0139519		
CMC Subpoena Response E-Discovery 0139520		
CMC Subpoena Response E-Discovery 0140316		
CMC Subpoena Response E-Discovery 0140323		
CMC Subpoena Response E-Discovery 0140348		
CMC Subpoena Response E-Discovery 0140387		
CMC Subpoena Response E-Discovery 0140388		
CMC Subpoena Response E-Discovery 0140391		
CMC Subpoena Response E-Discovery 0140511		
CMC Subpoena Response E-Discovery 0140699		
CMC Subpoena Response E-Discovery 0140703		
CMC Subpoena Response E-Discovery 0140705		
CMC Subpoena Response E-Discovery 0140723		
CMC Subpoena Response E-Discovery 0140731		
CMC Subpoena Response E-Discovery 0140748		
CMC Subpoena Response E-Discovery 0140749		
CMC Subpoena Response E-Discovery 0140755		
CMC Subpoena Response E-Discovery 0140761		

		CMC Subpoena Response E-Discovery 0140767 CMC Subpoena Response E-Discovery 0140807 CMC Subpoena Response E-Discovery 0140887 CMC Subpoena Response E-Discovery 0140888 CMC Subpoena Response E-Discovery 0141377 CMC Subpoena Response E-Discovery 0141384 CMC Subpoena Response E-Discovery 0141386 CMC Subpoena Response E-Discovery 0141394 CMC Subpoena Response E-Discovery 0141398 CMC Subpoena Response E-Discovery 0141400 CMC Subpoena Response E-Discovery 0141502 CMC Subpoena Response E-Discovery 0141633 CMC Subpoena Response E-Discovery 0141655 CMC Subpoena Response E-Discovery 0141664 CMC Subpoena Response E-Discovery 0141733 CMC Subpoena Response E-Discovery 0144457 CMC Subpoena Response E-Discovery 0144466 CMC Subpoena Response E-Discovery 0145176 CMC Subpoena Response E-Discovery 0145211 CMC Subpoena Response E-Discovery 0145333 CMC Subpoena Response E-Discovery 0145351 CMC Subpoena Response E-Discovery 0145356 CMC Subpoena Response E-Discovery 0145408 CMC Subpoena Response E-Discovery 0145413 CMC Subpoena Response E-Discovery 0145522 CMC Subpoena Response E-Discovery 0146125 CMC Subpoena Response E-Discovery 0146250 CMC Subpoena Response E-Discovery 0146270 CMC Subpoena Response E-Discovery 0146499 CMC Subpoena Response E-Discovery 0146521 CMC Subpoena Response E-Discovery 0146565 CMC Subpoena Response E-Discovery 0147874 CMC Subpoena Response E-Discovery 0148290
--	--	---

		CMC Subpoena Response E-Discovery 0149768 CMC Subpoena Response E-Discovery 0149976 CMC Subpoena Response E-Discovery 0152939 CMC Subpoena Response E-Discovery 0153410 CMC Subpoena Response E-Discovery 0153619 CMC Subpoena Response E-Discovery 0154052 CMC Subpoena Response E-Discovery 0155088 CMC Subpoena Response E-Discovery 0155506 CMC Subpoena Response E-Discovery 0161648 CMC Subpoena Response E-Discovery 0168046 CMC Subpoena Response E-Discovery 0168254 CMC Subpoena Response E-Discovery 0168462 CMC Subpoena Response E-Discovery 0168671 CMC Subpoena Response E-Discovery 0168880 CMC Subpoena Response E-Discovery 0173356 CMC Subpoena Response E-Discovery 0178125 CMC Subpoena Response E-Discovery 0178940 CMC Subpoena Response E-Discovery 0178941 CMC Subpoena Response E-Discovery 0188021 CMC Subpoena Response E-Discovery 0191381 CMC Subpoena Response E-Discovery 0192672 CMC Subpoena Response E-Discovery 0198955 CMC Subpoena Response E-Discovery 0202138 CMC Subpoena Response E-Discovery 0202349 CMC Subpoena Response E-Discovery 0203815 CMC Subpoena Response E-Discovery 0213191 CMC Subpoena Response E-Discovery 0218090 CMC Subpoena Response E-Discovery 0218304 CMC Subpoena Response E-Discovery 0218517 CMC Subpoena Response E-Discovery 0218730 CMC Subpoena Response E-Discovery 0218943 CMC Subpoena Response E-Discovery 0219367 CMC Subpoena Response E-Discovery 0219790
--	--	---

		CMC Subpoena Response E-Discovery 0220001 CMC Subpoena Response E-Discovery 0220212 CMC Subpoena Response E-Discovery 0221277 CMC Subpoena Response E-Discovery 0221700 CMC Subpoena Response E-Discovery 0221911
Sensitive and irrelevant financial data, including amounts of distributions to SSC members, ⁵ revenue/income, and SSC asset values	Financial information	CMC Subpoena Response E-Discovery 0001629 CMC Subpoena Response E-Discovery 0022785 CMC Subpoena Response E-Discovery 0023858 CMC Subpoena Response E-Discovery 0025282 CMC Subpoena Response E-Discovery 0025285 CMC Subpoena Response E-Discovery 0025288 CMC Subpoena Response E-Discovery 0025290 CMC Subpoena Response E-Discovery 0025292 CMC Subpoena Response E-Discovery 0025294 CMC Subpoena Response E-Discovery 0025296 CMC Subpoena Response E-Discovery 0025298 CMC Subpoena Response E-Discovery 0025300 CMC Subpoena Response E-Discovery 0025302 CMC Subpoena Response E-Discovery 0025304 CMC Subpoena Response E-Discovery 0025306 CMC Subpoena Response E-Discovery 0025308 CMC Subpoena Response E-Discovery 0025310 CMC Subpoena Response E-Discovery 0025312 CMC Subpoena Response E-Discovery 0025320 CMC Subpoena Response E-Discovery 0026862 CMC Subpoena Response E-Discovery 0026911 CMC Subpoena Response E-Discovery 0026932 CMC Subpoena Response E-Discovery 0026952 CMC Subpoena Response E-Discovery 0026979

⁵ Dr. Lister, Jon Simpson, MD, Donathan Ivey, MD, Susan Pick, MD, Mark Fox, MD, Mark Lee, MD, and/or Robert Nichols, MD.

		CMC Subpoena Response E-Discovery 0027006 CMC Subpoena Response E-Discovery 0027129 CMC Subpoena Response E-Discovery 0027130 CMC Subpoena Response E-Discovery 0027132 CMC Subpoena Response E-Discovery 0027133 CMC Subpoena Response E-Discovery 0027402 CMC Subpoena Response E-Discovery 0027406 CMC Subpoena Response E-Discovery 0027422 CMC Subpoena Response E-Discovery 0027438 CMC Subpoena Response E-Discovery 0028432 CMC Subpoena Response E-Discovery 0028435 CMC Subpoena Response E-Discovery 0028465 CMC Subpoena Response E-Discovery 0033065 CMC Subpoena Response E-Discovery 0033069 CMC Subpoena Response E-Discovery 0033416 CMC Subpoena Response E-Discovery 0033417 CMC Subpoena Response E-Discovery 0033423 CMC Subpoena Response E-Discovery 0033835 CMC Subpoena Response E-Discovery 0034242 CMC Subpoena Response E-Discovery 0034311 CMC Subpoena Response E-Discovery 0034332 CMC Subpoena Response E-Discovery 0034346 CMC Subpoena Response E-Discovery 0034425 CMC Subpoena Response E-Discovery 0034549 CMC Subpoena Response E-Discovery 0034558 CMC Subpoena Response E-Discovery 0034577 CMC Subpoena Response E-Discovery 0034604 CMC Subpoena Response E-Discovery 0034717 CMC Subpoena Response E-Discovery 0034720 CMC Subpoena Response E-Discovery 0034756 CMC Subpoena Response E-Discovery 0034818 CMC Subpoena Response E-Discovery 0038531 CMC Subpoena Response E-Discovery 0038572
--	--	---

		CMC Subpoena Response E-Discovery 0038604 CMC Subpoena Response E-Discovery 0038607 CMC Subpoena Response E-Discovery 0038801 CMC Subpoena Response E-Discovery 0038916 CMC Subpoena Response E-Discovery 0038980 CMC Subpoena Response E-Discovery 0038981 CMC Subpoena Response E-Discovery 0039118 CMC Subpoena Response E-Discovery 0039205 CMC Subpoena Response E-Discovery 0039245 CMC Subpoena Response E-Discovery 0039265 CMC Subpoena Response E-Discovery 0040114 CMC Subpoena Response E-Discovery 0043230 CMC Subpoena Response E-Discovery 0043271 CMC Subpoena Response E-Discovery 0043830 CMC Subpoena Response E-Discovery 0055447 CMC Subpoena Response E-Discovery 0055449 CMC Subpoena Response E-Discovery 0055450 CMC Subpoena Response E-Discovery 0055702 CMC Subpoena Response E-Discovery 0055711 CMC Subpoena Response E-Discovery 0058348 CMC Subpoena Response E-Discovery 0058621 CMC Subpoena Response E-Discovery 0058839 CMC Subpoena Response E-Discovery 0059059 CMC Subpoena Response E-Discovery 0059311 CMC Subpoena Response E-Discovery 0059315 CMC Subpoena Response E-Discovery 0059889 CMC Subpoena Response E-Discovery 0059893 CMC Subpoena Response E-Discovery 0075314 CMC Subpoena Response E-Discovery 0075315 CMC Subpoena Response E-Discovery 0075401 CMC Subpoena Response E-Discovery 0089436 CMC Subpoena Response E-Discovery 0089654 CMC Subpoena Response E-Discovery 0089661
--	--	---

		CMC Subpoena Response E-Discovery 0089908 CMC Subpoena Response E-Discovery 0090155 CMC Subpoena Response E-Discovery 0090431 CMC Subpoena Response E-Discovery 0090678 CMC Subpoena Response E-Discovery 0090925 CMC Subpoena Response E-Discovery 0091417 CMC Subpoena Response E-Discovery 0091664 CMC Subpoena Response E-Discovery 0091666 CMC Subpoena Response E-Discovery 0091913 CMC Subpoena Response E-Discovery 0092160 CMC Subpoena Response E-Discovery 0092646 CMC Subpoena Response E-Discovery 0092648 CMC Subpoena Response E-Discovery 0092891 CMC Subpoena Response E-Discovery 0093134 CMC Subpoena Response E-Discovery 0093373 CMC Subpoena Response E-Discovery 0093843 CMC Subpoena Response E-Discovery 0093845 CMC Subpoena Response E-Discovery 0094080 CMC Subpoena Response E-Discovery 0094313 CMC Subpoena Response E-Discovery 0094544 CMC Subpoena Response E-Discovery 0095000 CMC Subpoena Response E-Discovery 0095245 CMC Subpoena Response E-Discovery 0095247 CMC Subpoena Response E-Discovery 0095492 CMC Subpoena Response E-Discovery 0095735 CMC Subpoena Response E-Discovery 0095976 CMC Subpoena Response E-Discovery 0096215 CMC Subpoena Response E-Discovery 0096454 CMC Subpoena Response E-Discovery 0096691 CMC Subpoena Response E-Discovery 0096926 CMC Subpoena Response E-Discovery 0097161 CMC Subpoena Response E-Discovery 0102367 CMC Subpoena Response E-Discovery 0102613
--	--	---

		CMC Subpoena Response E-Discovery 0116521
		CMC Subpoena Response E-Discovery 0116528
		CMC Subpoena Response E-Discovery 0132087
		CMC Subpoena Response E-Discovery 0132197
		CMC Subpoena Response E-Discovery 0132779
		CMC Subpoena Response E-Discovery 0133016
		CMC Subpoena Response E-Discovery 0133044
		CMC Subpoena Response E-Discovery 0133056
		CMC Subpoena Response E-Discovery 0133171
		CMC Subpoena Response E-Discovery 0133233
		CMC Subpoena Response E-Discovery 0133235
		CMC Subpoena Response E-Discovery 0133305
		CMC Subpoena Response E-Discovery 0136035
		CMC Subpoena Response E-Discovery 0138088
		CMC Subpoena Response E-Discovery 0139002
		CMC Subpoena Response E-Discovery 0139010
		CMC Subpoena Response E-Discovery 0139011
		CMC Subpoena Response E-Discovery 0139012
		CMC Subpoena Response E-Discovery 0139013
		CMC Subpoena Response E-Discovery 0139738
		CMC Subpoena Response E-Discovery 0139739
		CMC Subpoena Response E-Discovery 0139748
		CMC Subpoena Response E-Discovery 0139751
		CMC Subpoena Response E-Discovery 0140468
		CMC Subpoena Response E-Discovery 0140479
		CMC Subpoena Response E-Discovery 0140592
		CMC Subpoena Response E-Discovery 0140710
		CMC Subpoena Response E-Discovery 0140728
		CMC Subpoena Response E-Discovery 0140730
		CMC Subpoena Response E-Discovery 0140838
		CMC Subpoena Response E-Discovery 0141637
		CMC Subpoena Response E-Discovery 0141859
		CMC Subpoena Response E-Discovery 0142072

		CMC Subpoena Response E-Discovery 0142158 CMC Subpoena Response E-Discovery 0143239 CMC Subpoena Response E-Discovery 0143246 CMC Subpoena Response E-Discovery 0143689 CMC Subpoena Response E-Discovery 0143691 CMC Subpoena Response E-Discovery 0143693 CMC Subpoena Response E-Discovery 0143696 CMC Subpoena Response E-Discovery 0143698 CMC Subpoena Response E-Discovery 0143782 CMC Subpoena Response E-Discovery 0143841 CMC Subpoena Response E-Discovery 0143863 CMC Subpoena Response E-Discovery 0143871 CMC Subpoena Response E-Discovery 0143977 CMC Subpoena Response E-Discovery 0143980 CMC Subpoena Response E-Discovery 0144226 CMC Subpoena Response E-Discovery 0144922 CMC Subpoena Response E-Discovery 0144938 CMC Subpoena Response E-Discovery 0144958 CMC Subpoena Response E-Discovery 0145336 CMC Subpoena Response E-Discovery 0145495 CMC Subpoena Response E-Discovery 0145498 CMC Subpoena Response E-Discovery 0145974 CMC Subpoena Response E-Discovery 0145977 CMC Subpoena Response E-Discovery 0145983 CMC Subpoena Response E-Discovery 0145989 CMC Subpoena Response E-Discovery 0146243 CMC Subpoena Response E-Discovery 0146400 CMC Subpoena Response E-Discovery 0146496 CMC Subpoena Response E-Discovery 0146513 CMC Subpoena Response E-Discovery 0146628 CMC Subpoena Response E-Discovery 0146662 CMC Subpoena Response E-Discovery 0146676 CMC Subpoena Response E-Discovery 0146713
--	--	---

		CMC Subpoena Response E-Discovery 0146748 CMC Subpoena Response E-Discovery 0146752 CMC Subpoena Response E-Discovery 0146758 CMC Subpoena Response E-Discovery 0146794 CMC Subpoena Response E-Discovery 0146897 CMC Subpoena Response E-Discovery 0146907 CMC Subpoena Response E-Discovery 0146972 CMC Subpoena Response E-Discovery 0146983 CMC Subpoena Response E-Discovery 0147001 CMC Subpoena Response E-Discovery 0147005 CMC Subpoena Response E-Discovery 0147014 CMC Subpoena Response E-Discovery 0147023 CMC Subpoena Response E-Discovery 0147031 CMC Subpoena Response E-Discovery 0147032 CMC Subpoena Response E-Discovery 0147047 CMC Subpoena Response E-Discovery 0147050 CMC Subpoena Response E-Discovery 0147053 CMC Subpoena Response E-Discovery 0147062 CMC Subpoena Response E-Discovery 0147066 CMC Subpoena Response E-Discovery 0147067 CMC Subpoena Response E-Discovery 0147094 CMC Subpoena Response E-Discovery 0147097 CMC Subpoena Response E-Discovery 0147100 CMC Subpoena Response E-Discovery 0147103 CMC Subpoena Response E-Discovery 0147106 CMC Subpoena Response E-Discovery 0147107 CMC Subpoena Response E-Discovery 0147128 CMC Subpoena Response E-Discovery 0147154 CMC Subpoena Response E-Discovery 0147427 CMC Subpoena Response E-Discovery 0147445 CMC Subpoena Response E-Discovery 0147456 CMC Subpoena Response E-Discovery 0147464 CMC Subpoena Response E-Discovery 0147596
--	--	---

		CMC Subpoena Response E-Discovery 0147874
		CMC Subpoena Response E-Discovery 0148290
		CMC Subpoena Response E-Discovery 0148512
		CMC Subpoena Response E-Discovery 0148918
		CMC Subpoena Response E-Discovery 0148920
		CMC Subpoena Response E-Discovery 0149124
		CMC Subpoena Response E-Discovery 0149530
		CMC Subpoena Response E-Discovery 0149553
		CMC Subpoena Response E-Discovery 0149768
		CMC Subpoena Response E-Discovery 0149976
		CMC Subpoena Response E-Discovery 0150191
		CMC Subpoena Response E-Discovery 0150395
		CMC Subpoena Response E-Discovery 0150425
		CMC Subpoena Response E-Discovery 0150492
		CMC Subpoena Response E-Discovery 0150695
		CMC Subpoena Response E-Discovery 0150898
		CMC Subpoena Response E-Discovery 0151101
		CMC Subpoena Response E-Discovery 0151304
		CMC Subpoena Response E-Discovery 0151510
		CMC Subpoena Response E-Discovery 0151713
		CMC Subpoena Response E-Discovery 0152118
		CMC Subpoena Response E-Discovery 0152119
		CMC Subpoena Response E-Discovery 0152524
		CMC Subpoena Response E-Discovery 0152525
		CMC Subpoena Response E-Discovery 0152939
		CMC Subpoena Response E-Discovery 0153153
		CMC Subpoena Response E-Discovery 0153410
		CMC Subpoena Response E-Discovery 0153411
		CMC Subpoena Response E-Discovery 0153619
		CMC Subpoena Response E-Discovery 0153839
		CMC Subpoena Response E-Discovery 0154052
		CMC Subpoena Response E-Discovery 0154259
		CMC Subpoena Response E-Discovery 0154672

		CMC Subpoena Response E-Discovery 0154673 CMC Subpoena Response E-Discovery 0154880 CMC Subpoena Response E-Discovery 0155088 CMC Subpoena Response E-Discovery 0155297 CMC Subpoena Response E-Discovery 0155506 CMC Subpoena Response E-Discovery 0155715 CMC Subpoena Response E-Discovery 0155922 CMC Subpoena Response E-Discovery 0156129 CMC Subpoena Response E-Discovery 0156337 CMC Subpoena Response E-Discovery 0156546 CMC Subpoena Response E-Discovery 0156789 CMC Subpoena Response E-Discovery 0156996 CMC Subpoena Response E-Discovery 0157203 CMC Subpoena Response E-Discovery 0157410 CMC Subpoena Response E-Discovery 0157617 CMC Subpoena Response E-Discovery 0158243 CMC Subpoena Response E-Discovery 0158246 CMC Subpoena Response E-Discovery 0158455 CMC Subpoena Response E-Discovery 0158870 CMC Subpoena Response E-Discovery 0158874 CMC Subpoena Response E-Discovery 0159290 CMC Subpoena Response E-Discovery 0159703 CMC Subpoena Response E-Discovery 0159706 CMC Subpoena Response E-Discovery 0160119 CMC Subpoena Response E-Discovery 0160122 CMC Subpoena Response E-Discovery 0160330 CMC Subpoena Response E-Discovery 0160538 CMC Subpoena Response E-Discovery 0160951 CMC Subpoena Response E-Discovery 0160954 CMC Subpoena Response E-Discovery 0161162 CMC Subpoena Response E-Discovery 0161232 CMC Subpoena Response E-Discovery 0161645 CMC Subpoena Response E-Discovery 0162065
--	--	---

		CMC Subpoena Response E-Discovery 0162276 CMC Subpoena Response E-Discovery 0162283 CMC Subpoena Response E-Discovery 0162492 CMC Subpoena Response E-Discovery 0162701 CMC Subpoena Response E-Discovery 0162912 CMC Subpoena Response E-Discovery 0163331 CMC Subpoena Response E-Discovery 0163334 CMC Subpoena Response E-Discovery 0163754 CMC Subpoena Response E-Discovery 0163757 CMC Subpoena Response E-Discovery 0163969 CMC Subpoena Response E-Discovery 0164183 CMC Subpoena Response E-Discovery 0164395 CMC Subpoena Response E-Discovery 0164607 CMC Subpoena Response E-Discovery 0165029 CMC Subpoena Response E-Discovery 0165242 CMC Subpoena Response E-Discovery 0165245 CMC Subpoena Response E-Discovery 0165453 CMC Subpoena Response E-Discovery 0165661 CMC Subpoena Response E-Discovery 0165877 CMC Subpoena Response E-Discovery 0166083 CMC Subpoena Response E-Discovery 0166168 CMC Subpoena Response E-Discovery 0166374 CMC Subpoena Response E-Discovery 0166785 CMC Subpoena Response E-Discovery 0166789 CMC Subpoena Response E-Discovery 0166997 CMC Subpoena Response E-Discovery 0167411 CMC Subpoena Response E-Discovery 0167622 CMC Subpoena Response E-Discovery 0167828 CMC Subpoena Response E-Discovery 0167832 CMC Subpoena Response E-Discovery 0167838 CMC Subpoena Response E-Discovery 0168046 CMC Subpoena Response E-Discovery 0168254 CMC Subpoena Response E-Discovery 0168462
--	--	---

		CMC Subpoena Response E-Discovery 0168671
		CMC Subpoena Response E-Discovery 0168880
		CMC Subpoena Response E-Discovery 0169088
		CMC Subpoena Response E-Discovery 0169507
		CMC Subpoena Response E-Discovery 0169791
		CMC Subpoena Response E-Discovery 0169999
		CMC Subpoena Response E-Discovery 0170207
		CMC Subpoena Response E-Discovery 0171247
		CMC Subpoena Response E-Discovery 0171455
		CMC Subpoena Response E-Discovery 0171663
		CMC Subpoena Response E-Discovery 0171871
		CMC Subpoena Response E-Discovery 0172079
		CMC Subpoena Response E-Discovery 0172287
		CMC Subpoena Response E-Discovery 0172495
		CMC Subpoena Response E-Discovery 0172703
		CMC Subpoena Response E-Discovery 0172911
		CMC Subpoena Response E-Discovery 0173356
		CMC Subpoena Response E-Discovery 0173561
		CMC Subpoena Response E-Discovery 0173766
		CMC Subpoena Response E-Discovery 0173971
		CMC Subpoena Response E-Discovery 0174176
		CMC Subpoena Response E-Discovery 0174381
		CMC Subpoena Response E-Discovery 0174586
		CMC Subpoena Response E-Discovery 0174791
		CMC Subpoena Response E-Discovery 0175404
		CMC Subpoena Response E-Discovery 0175609
		CMC Subpoena Response E-Discovery 0175611
		CMC Subpoena Response E-Discovery 0176023
		CMC Subpoena Response E-Discovery 0176230
		CMC Subpoena Response E-Discovery 0176232
		CMC Subpoena Response E-Discovery 0176439
		CMC Subpoena Response E-Discovery 0176645
		CMC Subpoena Response E-Discovery 0176853

		CMC Subpoena Response E-Discovery 0177061 CMC Subpoena Response E-Discovery 0177269 CMC Subpoena Response E-Discovery 0177480 CMC Subpoena Response E-Discovery 0177485 CMC Subpoena Response E-Discovery 0177501 CMC Subpoena Response E-Discovery 0177709 CMC Subpoena Response E-Discovery 0178122 CMC Subpoena Response E-Discovery 0178125 CMC Subpoena Response E-Discovery 0178329 CMC Subpoena Response E-Discovery 0178533 CMC Subpoena Response E-Discovery 0178940 CMC Subpoena Response E-Discovery 0178941 CMC Subpoena Response E-Discovery 0179146 CMC Subpoena Response E-Discovery 0179558 CMC Subpoena Response E-Discovery 0179560 CMC Subpoena Response E-Discovery 0179767 CMC Subpoena Response E-Discovery 0179974 CMC Subpoena Response E-Discovery 0180192 CMC Subpoena Response E-Discovery 0180398 CMC Subpoena Response E-Discovery 0180809 CMC Subpoena Response E-Discovery 0181022 CMC Subpoena Response E-Discovery 0181023 CMC Subpoena Response E-Discovery 0181229 CMC Subpoena Response E-Discovery 0181435 CMC Subpoena Response E-Discovery 0181641 CMC Subpoena Response E-Discovery 0181847 CMC Subpoena Response E-Discovery 0182053 CMC Subpoena Response E-Discovery 0182259 CMC Subpoena Response E-Discovery 0182466 CMC Subpoena Response E-Discovery 0182533 CMC Subpoena Response E-Discovery 0182945 CMC Subpoena Response E-Discovery 0182947 CMC Subpoena Response E-Discovery 0183359
--	--	---

		CMC Subpoena Response E-Discovery 0183373
		CMC Subpoena Response E-Discovery 0183580
		CMC Subpoena Response E-Discovery 0184006
		CMC Subpoena Response E-Discovery 0184008
		CMC Subpoena Response E-Discovery 0184217
		CMC Subpoena Response E-Discovery 0184219
		CMC Subpoena Response E-Discovery 0184225
		CMC Subpoena Response E-Discovery 0184229
		CMC Subpoena Response E-Discovery 0184233
		CMC Subpoena Response E-Discovery 0184463
		CMC Subpoena Response E-Discovery 0184677
		CMC Subpoena Response E-Discovery 0184883
		CMC Subpoena Response E-Discovery 0185295
		CMC Subpoena Response E-Discovery 0185501
		CMC Subpoena Response E-Discovery 0185708
		CMC Subpoena Response E-Discovery 0186121
		CMC Subpoena Response E-Discovery 0186122
		CMC Subpoena Response E-Discovery 0186738
		CMC Subpoena Response E-Discovery 0187269
		CMC Subpoena Response E-Discovery 0187968
		CMC Subpoena Response E-Discovery 0187998
		CMC Subpoena Response E-Discovery 0187999
		CMC Subpoena Response E-Discovery 0188000
		CMC Subpoena Response E-Discovery 0188021
		CMC Subpoena Response E-Discovery 0188434
		CMC Subpoena Response E-Discovery 0188854
		CMC Subpoena Response E-Discovery 0188884
		CMC Subpoena Response E-Discovery 0189106
		CMC Subpoena Response E-Discovery 0189109
		CMC Subpoena Response E-Discovery 0189112
		CMC Subpoena Response E-Discovery 0189115
		CMC Subpoena Response E-Discovery 0189116
		CMC Subpoena Response E-Discovery 0189218

		CMC Subpoena Response E-Discovery 0189380 CMC Subpoena Response E-Discovery 0189516 CMC Subpoena Response E-Discovery 0189520 CMC Subpoena Response E-Discovery 0190033 CMC Subpoena Response E-Discovery 0190037 CMC Subpoena Response E-Discovery 0190363 CMC Subpoena Response E-Discovery 0190366 CMC Subpoena Response E-Discovery 0190512 CMC Subpoena Response E-Discovery 0190535 CMC Subpoena Response E-Discovery 0190557 CMC Subpoena Response E-Discovery 0190626 CMC Subpoena Response E-Discovery 0190658 CMC Subpoena Response E-Discovery 0190665 CMC Subpoena Response E-Discovery 0190667 CMC Subpoena Response E-Discovery 0190672 CMC Subpoena Response E-Discovery 0190687 CMC Subpoena Response E-Discovery 0190691 CMC Subpoena Response E-Discovery 0190693 CMC Subpoena Response E-Discovery 0190695 CMC Subpoena Response E-Discovery 0190749 CMC Subpoena Response E-Discovery 0190751 CMC Subpoena Response E-Discovery 0190776 CMC Subpoena Response E-Discovery 0190783 CMC Subpoena Response E-Discovery 0190798 CMC Subpoena Response E-Discovery 0190802 CMC Subpoena Response E-Discovery 0190804 CMC Subpoena Response E-Discovery 0190806 CMC Subpoena Response E-Discovery 0190901 CMC Subpoena Response E-Discovery 0190903 CMC Subpoena Response E-Discovery 0190905 CMC Subpoena Response E-Discovery 0190907 CMC Subpoena Response E-Discovery 0190909 CMC Subpoena Response E-Discovery 0190911
--	--	---

		CMC Subpoena Response E-Discovery 0190916 CMC Subpoena Response E-Discovery 0191002 CMC Subpoena Response E-Discovery 0191063 CMC Subpoena Response E-Discovery 0191064 CMC Subpoena Response E-Discovery 0191065 CMC Subpoena Response E-Discovery 0191074 CMC Subpoena Response E-Discovery 0191077 CMC Subpoena Response E-Discovery 0191113 CMC Subpoena Response E-Discovery 0191117 CMC Subpoena Response E-Discovery 0191234 CMC Subpoena Response E-Discovery 0191336 CMC Subpoena Response E-Discovery 0191661 CMC Subpoena Response E-Discovery 0191919 CMC Subpoena Response E-Discovery 0192579 CMC Subpoena Response E-Discovery 0192763 CMC Subpoena Response E-Discovery 0192768 CMC Subpoena Response E-Discovery 0192770 CMC Subpoena Response E-Discovery 0192821 CMC Subpoena Response E-Discovery 0192825 CMC Subpoena Response E-Discovery 0192829 CMC Subpoena Response E-Discovery 0192868 CMC Subpoena Response E-Discovery 0192899 CMC Subpoena Response E-Discovery 0192984 CMC Subpoena Response E-Discovery 0193058 CMC Subpoena Response E-Discovery 0193094 CMC Subpoena Response E-Discovery 0193219 CMC Subpoena Response E-Discovery 0193231 CMC Subpoena Response E-Discovery 0193326 CMC Subpoena Response E-Discovery 0193345 CMC Subpoena Response E-Discovery 0193406 CMC Subpoena Response E-Discovery 0193550 CMC Subpoena Response E-Discovery 0193592 CMC Subpoena Response E-Discovery 0193903
--	--	---

		CMC Subpoena Response E-Discovery 0193958 CMC Subpoena Response E-Discovery 0194013 CMC Subpoena Response E-Discovery 0194097 CMC Subpoena Response E-Discovery 0194098 CMC Subpoena Response E-Discovery 0194207 CMC Subpoena Response E-Discovery 0194725 CMC Subpoena Response E-Discovery 0194755 CMC Subpoena Response E-Discovery 0194992 CMC Subpoena Response E-Discovery 0195042 CMC Subpoena Response E-Discovery 0195044 CMC Subpoena Response E-Discovery 0195069 CMC Subpoena Response E-Discovery 0195071 CMC Subpoena Response E-Discovery 0195073 CMC Subpoena Response E-Discovery 0195292 CMC Subpoena Response E-Discovery 0195330 CMC Subpoena Response E-Discovery 0195331 CMC Subpoena Response E-Discovery 0195343 CMC Subpoena Response E-Discovery 0195387 CMC Subpoena Response E-Discovery 0195432 CMC Subpoena Response E-Discovery 0195483 CMC Subpoena Response E-Discovery 0195553 CMC Subpoena Response E-Discovery 0195574 CMC Subpoena Response E-Discovery 0195597 CMC Subpoena Response E-Discovery 0195600 CMC Subpoena Response E-Discovery 0195614 CMC Subpoena Response E-Discovery 0195643 CMC Subpoena Response E-Discovery 0195698 CMC Subpoena Response E-Discovery 0195729 CMC Subpoena Response E-Discovery 0195758 CMC Subpoena Response E-Discovery 0195787 CMC Subpoena Response E-Discovery 0195816 CMC Subpoena Response E-Discovery 0195817 CMC Subpoena Response E-Discovery 0195843
--	--	---

		CMC Subpoena Response E-Discovery 0196156
		CMC Subpoena Response E-Discovery 0196306
		CMC Subpoena Response E-Discovery 0196458
		CMC Subpoena Response E-Discovery 0196461
		CMC Subpoena Response E-Discovery 0196464
		CMC Subpoena Response E-Discovery 0196467
		CMC Subpoena Response E-Discovery 0196856
		CMC Subpoena Response E-Discovery 0196859
		CMC Subpoena Response E-Discovery 0197069
		CMC Subpoena Response E-Discovery 0197276
		CMC Subpoena Response E-Discovery 0197484
		CMC Subpoena Response E-Discovery 0197692
		CMC Subpoena Response E-Discovery 0197694
		CMC Subpoena Response E-Discovery 0198316
		CMC Subpoena Response E-Discovery 0198318
		CMC Subpoena Response E-Discovery 0198742
		CMC Subpoena Response E-Discovery 0198955
		CMC Subpoena Response E-Discovery 0198957
		CMC Subpoena Response E-Discovery 0199170
		CMC Subpoena Response E-Discovery 0199595
		CMC Subpoena Response E-Discovery 0199597
		CMC Subpoena Response E-Discovery 0200022
		CMC Subpoena Response E-Discovery 0200236
		CMC Subpoena Response E-Discovery 0200450
		CMC Subpoena Response E-Discovery 0200663
		CMC Subpoena Response E-Discovery 0200665
		CMC Subpoena Response E-Discovery 0201085
		CMC Subpoena Response E-Discovery 0201294
		CMC Subpoena Response E-Discovery 0201503
		CMC Subpoena Response E-Discovery 0201715
		CMC Subpoena Response E-Discovery 0201717
		CMC Subpoena Response E-Discovery 0202138
		CMC Subpoena Response E-Discovery 0202349

		CMC Subpoena Response E-Discovery 0202561
		CMC Subpoena Response E-Discovery 0202562
		CMC Subpoena Response E-Discovery 0202773
		CMC Subpoena Response E-Discovery 0202983
		CMC Subpoena Response E-Discovery 0203191
		CMC Subpoena Response E-Discovery 0203399
		CMC Subpoena Response E-Discovery 0203607
		CMC Subpoena Response E-Discovery 0203815
		CMC Subpoena Response E-Discovery 0204023
		CMC Subpoena Response E-Discovery 0204439
		CMC Subpoena Response E-Discovery 0204854
		CMC Subpoena Response E-Discovery 0205060
		CMC Subpoena Response E-Discovery 0205278
		CMC Subpoena Response E-Discovery 0205484
		CMC Subpoena Response E-Discovery 0205689
		CMC Subpoena Response E-Discovery 0205894
		CMC Subpoena Response E-Discovery 0205896
		CMC Subpoena Response E-Discovery 0206305
		CMC Subpoena Response E-Discovery 0206510
		CMC Subpoena Response E-Discovery 0206861
		CMC Subpoena Response E-Discovery 0207073
		CMC Subpoena Response E-Discovery 0207286
		CMC Subpoena Response E-Discovery 0207288
		CMC Subpoena Response E-Discovery 0207498
		CMC Subpoena Response E-Discovery 0207707
		CMC Subpoena Response E-Discovery 0208124
		CMC Subpoena Response E-Discovery 0208333
		CMC Subpoena Response E-Discovery 0208542
		CMC Subpoena Response E-Discovery 0208750
		CMC Subpoena Response E-Discovery 0208958
		CMC Subpoena Response E-Discovery 0209166
		CMC Subpoena Response E-Discovery 0209378
		CMC Subpoena Response E-Discovery 0209589

CMC Subpoena Response E-Discovery 0209799		
CMC Subpoena Response E-Discovery 0210012		
CMC Subpoena Response E-Discovery 0210014		
CMC Subpoena Response E-Discovery 0210432		
CMC Subpoena Response E-Discovery 0210642		
CMC Subpoena Response E-Discovery 0210852		
CMC Subpoena Response E-Discovery 0211064		
CMC Subpoena Response E-Discovery 0211276		
CMC Subpoena Response E-Discovery 0211489		
CMC Subpoena Response E-Discovery 0211703		
CMC Subpoena Response E-Discovery 0211916		
CMC Subpoena Response E-Discovery 0212129		
CMC Subpoena Response E-Discovery 0212343		
CMC Subpoena Response E-Discovery 0212345		
CMC Subpoena Response E-Discovery 0212771		
CMC Subpoena Response E-Discovery 0212981		
CMC Subpoena Response E-Discovery 0213191		
CMC Subpoena Response E-Discovery 0213400		
CMC Subpoena Response E-Discovery 0213610		
CMC Subpoena Response E-Discovery 0213820		
CMC Subpoena Response E-Discovery 0213822		
CMC Subpoena Response E-Discovery 0214239		
CMC Subpoena Response E-Discovery 0214447		
CMC Subpoena Response E-Discovery 0214449		
CMC Subpoena Response E-Discovery 0214865		
CMC Subpoena Response E-Discovery 0217661		
CMC Subpoena Response E-Discovery 0217876		
CMC Subpoena Response E-Discovery 0218090		
CMC Subpoena Response E-Discovery 0218304		
CMC Subpoena Response E-Discovery 0218517		
CMC Subpoena Response E-Discovery 0218730		
CMC Subpoena Response E-Discovery 0218943		
CMC Subpoena Response E-Discovery 0219155		

		CMC Subpoena Response E-Discovery 0219367 CMC Subpoena Response E-Discovery 0219579 CMC Subpoena Response E-Discovery 0219790 CMC Subpoena Response E-Discovery 0220001 CMC Subpoena Response E-Discovery 0220212 CMC Subpoena Response E-Discovery 0220639 CMC Subpoena Response E-Discovery 0220852 CMC Subpoena Response E-Discovery 0221065 CMC Subpoena Response E-Discovery 0221277 CMC Subpoena Response E-Discovery 0221489 CMC Subpoena Response E-Discovery 0221700 CMC Subpoena Response E-Discovery 0221911 CMC Subpoena Response E-Discovery 0222120 CMC Subpoena Response E-Discovery 0222328 CMC Subpoena Response E-Discovery 0223620 CMC Subpoena Response E-Discovery 0225721 CMC Subpoena Response E-Discovery 0225725 CMC Subpoena Response E-Discovery 0225964 CMC Subpoena Response E-Discovery 0225966 CMC Subpoena Response E-Discovery 0225984 CMC Subpoena Response E-Discovery 0228672
--	--	---

TABLE 2

Description of Information Withheld	Senders/Recipients	Privilege Asserted	Files Withheld⁶
<p>Emails between Jean Atkinson and counsel containing advice or information from counsel, seeking advice or information to counsel for the purposes of obtaining advice from counsel, or emails containing information prepared in anticipation of litigation.</p>	<p>Jean Atkinson, counsel, Kim Bowlin, SSC members, Calisher & Associates, STOPNC/Howell Allen, and/or Dr. Jones</p>	<p>Attorney-Client Privilege; Work Product Doctrine; Common-Interest/Joint Defense Privilege</p>	<p>36</p>
<p>Email exchange between Jean Atkinson and counsel containing advice or information from counsel, seeking advice or information to counsel for the purposes of obtaining advice from counsel, or emails containing information prepared in anticipation of litigation, which Kim Bowlin forwarded to Calisher & Associates and SSC members.</p>	<p>Jean Atkinson, counsel, Kim Bowlin, Calisher & Associates, and/or SSC members</p>	<p>Attorney-Client Privilege; Work Product Doctrine; Common-Interest/Joint Defense Privilege</p>	<p>1</p>

⁶ Estimated.

Email exchange between Jean Atkinson and counsel containing advice or information from counsel, seeking advice or information from counsel, or providing information to counsel for the purposes of obtaining advice from counsel, or emails containing information prepared in anticipation of litigation, which Kim Bowlin forwarded to Calisher & Associates.	Jean Atkinson, counsel, Kim Bowlin, and/or Calisher & Associates	Attorney-Client Privilege; Work Product Doctrine; Common-Interest/Joint Defense Privilege	1
Email exchange between Jean Atkinson, STOPNC/Howell Allen, Dr. Jones, Dr. Lister, and counsel containing advice or information from counsel, seeking advice or information from counsel, or providing information to counsel for the purposes of obtaining advice from counsel, or emails containing information prepared in anticipation of litigation, which Jean Atkinson forwarded to Calisher & Associates and Kim Bowlin.	STOPNC/Howell Allen, Dr. Jones, Jean Atkinson, counsel, Kim Bowlin, Calisher & Associates, and/or SSC members	Attorney-Client Privilege; Work Product Doctrine; Common-Interest/Joint Defense Privilege	1

<p>Email from counsel to STOPNC/Howell Allen, Dr. Jones, Kim Bowlin, and Dr. Lister containing advice or information from counsel, seeking advice or information from counsel, or providing information to counsel for the purposes of obtaining advice from counsel, or emails containing information prepared in anticipation of litigation, which Kim Bowlin forwarded to Calisher & Associates and SSC members.</p>	<p>STOPNC/Howell Allen, Dr. Jones, counsel, Kim Bowlin, Calisher Associates, and/or SSC members</p>	<p>Attorney-Client Privilege; Work Product Doctrine; Common-Interest/Joint Defense Privilege</p>	<p>3</p>
<p>Email from counsel to STOPNC/Howell Allen, Dr. Jones, Kim Bowlin, and Dr. Lister containing advice or information from counsel, seeking advice or information from counsel, or providing information to counsel for the purposes of obtaining advice from counsel, or emails containing information prepared in anticipation of litigation, which Kim Bowlin forwarded to Jean Atkinson, Calisher & Associates, and SSC members.</p>	<p>STOPNC/Howell Allen, Dr. Jones, Jean Atkinson, counsel, Kim Bowlin, Calisher & Associates, and/or SSC members</p>	<p>Attorney-Client Privilege; Work Product Doctrine; Common-Interest/Joint Defense Privilege</p>	<p>6</p>

<p>Email from counsel to STOPNC/Howell Allen, Dr. Jones, Kim Bowlin, and Dr. Lister containing advice or information from counsel, seeking advice or information from counsel, or providing information to counsel for the purposes of obtaining advice from counsel, or emails containing information prepared in anticipation of litigation, which Kim Bowlin forwarded to Jean Atkinson and Calisher & Associates.</p>	<p>STOPNC/Howell Allen, Dr. Jones, Jean Atkinson, counsel, Kim Bowlin, Calisher & Associates, and/or Dr. Lister</p>	<p>Attorney-Client Privilege; Work Product Doctrine; Common-Interest/Joint Defense Privilege</p>	<p>1</p>
<p>Email from counsel to STOPNC/Howell Allen, Dr. Jones, Kim Bowlin, and Dr. Lister containing advice or information from counsel, seeking advice or information from counsel, or providing information to counsel for the purposes of obtaining advice from counsel, or emails containing information prepared in anticipation of litigation, which Kim Bowlin forwarded to Jean Atkinson.</p>	<p>STOPNC/Howell Allen, Dr. Jones, Jean Atkinson, counsel, Dr. Lister, and/or Kim Bowlin</p>	<p>Attorney-Client Privilege; Work Product Doctrine; Common-Interest/Joint Defense Privilege</p>	<p>2</p>

Email from counsel to STOPNC/Howell Allen, Dr. Jones, Kim Bowlin, and Dr. Lister containing advice or information from counsel, seeking advice or information from counsel, or providing information to counsel for the purposes of obtaining advice from counsel, or emails containing information prepared in anticipation of litigation, which Kim Bowlin forwarded Calisher & Associates.	STOPNC/Howell Allen, Dr. Jones, counsel, Kim Bowlin, Dr. Lister, and/or Calisher & Associates	Attorney-Client Privilege; Work Product Doctrine; Common-Interest/Joint Defense Privilege	3
Email exchange between Kim Bowlin and counsel updating counsel on the status of Jean Atkinson's execution of an affidavit for the TN Board of Pharmacy's board action against SSC and Barry Cadden	Kim Bowlin and counsel	Attorney-Client Privilege; Work Product Doctrine; Common-Interest/Joint Defense Privilege	1
Emails between STOPNC/Howell Allen or Dr. Jones and counsel containing advice or information from counsel, seeking advice or information from counsel, or providing information to counsel for the purposes of obtaining advice from counsel, or emails containing information prepared in anticipation of litigation.	STOPNC/Howell Allen, Dr. Jones, counsel, and Kim Bowlin, SVMIC claims attorneys, Jean Atkinson, SSC members, and/or Calisher & Associates	Attorney-Client Privilege; Work Product Doctrine; Common-Interest/Joint Defense Privilege	105

Email discussion about performing lumbar punctures during meningitis outbreak at SSC due to Cumberland Medical Center's inability to handle volume and attendant credentialing and potential safety issues.	Counsel, SVMIC claims attorney, SSC members, Calisher & Associates, and/or Kim Bowlin	Quality Improvement Privilege, Tenn. Code Ann. § 68-11-272; Peer Review Privilege Tenn. Code Ann. § 63-6-219	3
Email exchange about credentialing/re-credentialing Dr. Lister in March 2013	Kim Bowlin and Dr. Lister	Quality Improvement Privilege, Tenn. Code Ann. § 68-11-272; Peer Review Privilege Tenn. Code Ann. § 63-6-219	1
Email exchange about Dr. Lister's credentialing in June 2012	Kim Bowlin and Gina Calisher	Quality Improvement Privilege, Tenn. Code Ann. § 68-11-272; Peer Review Privilege Tenn. Code Ann. § 63-6-219	1
Letter dated November 11, 2012 from Gina Calisher to SSC members about potential HIPAA issues sending protected health information via email and proposed corrective action.	Gina Calisher, SSC members, and/or Kim Bowlin	Quality Improvement Privilege, Tenn. Code Ann. § 68-11-272	3 copies of same letter

Letter dated December 15, 2009 from Calisher & Associates to SSC members regarding review of clinical staff training, education, and experience with proposed corrective action.	Calisher & Associates and SSC members	Quality Improvement Privilege, Tenn. Code Ann. § 68-11-272	1
Email discussion in January 2013 about safety of restarting injections in patients who received contaminated MPA, with input provided by consulting infectious disease specialists.	Dr. Lister, Kim Bowlin, and/or counsel	Quality Improvement Privilege, Tenn. Code Ann. § 68-11-272	2
Email in August 2011 about CRNAs writing orders and giving verbal orders and required sign-off by physician/anesthesiologist and corrective action.	Kim Bowlin and Calisher & Associates	Quality Improvement Privilege, Tenn. Code Ann. § 68-11-272	1
Email discussion in January 2012 about root cause analysis for missing narcotics, root cause analysis form, investigation, and corrective action.	Jean Atkinson, Calisher & Associates, and/or Kim Bowlin	Quality Improvement Privilege, Tenn. Code Ann. § 68-11-272	4

Respectfully submitted,

GIDEON, COOPER & ESSARY, PLC

/s/ Matthew H. Cline

C.J. Gideon, Jr.*

Chris J. Tardio*

Alan S. Bean**

Matthew H. Cline*

315 Deaderick Street, Suite

Nashville, TN 37238

Ph: (615) 254-0400

Fax: (515) 254-0459

matt@gideoncooper.com

Attorneys for SSC and Jean Atkinson, RN

/s/ Kent E. Krause

PARKS T. CHASTAIN**

KENT E. KRAUSE**

ASHLEY E. GENO**

Attorneys for Defendant, Specialty Surgery Center,
PLLC

**BREWER, KRAUSE, BROOKS & CHASTAIN,
PLLC**

P. O. Box 23890

Nashville, TN 37202-3890

(615) 256-8787 (PTC)

(615) 256-8985 (Fax)

pchastain@bkblaw.com

kkrause@bkblaw.com

ageno@bkblaw.com

* Admitted pursuant to MDL Order No. 1

** Admitted *pro hac vice*.

CERTIFICATE OF SERVICE

I hereby certify that on the 23rd day of November, 2016, a true and accurate copy of the foregoing was served on the following by electronic mail.

<p>Ben Gastel Anthony Orlandi Branstetter, Stranch & Jennings, PLLC The Freedom Center 223 Rosa L. Parks Ave. Suite 200 Nashville, TN 37203 beng@BSJFirm.com aorlandi@bsjfirm.com</p> <p><i>Attorneys for the PSC</i></p>	<p>John W. Moran LeClairRyan One International Place, Eleventh Floor Boston, Massachusetts 02110 (617) 502-8212 Direct (617) 502-8262 Fax John.Moran@leclairryan.com</p> <p><i>Attorneys for Calisher & Associates</i></p>
---	--

/s/ Matthew H. Cline
Matthew H. Cline